

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

ALVIN J. JOHNSON,

Debtor.

Case No. 16-41277-PJS
Honorable PHILLIP J. SHEFFERLY
Chapter 13

6819 Covert Street
Detroit, MI 48212
XXX-XX-8712

**OBJECTIONS TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN
ON BEHALF OF FORD MOTOR CREDIT COMPANY LLC**

Creditor Ford Motor Credit Company LLC ("Objector") by and through counsel, KILPATRICK & ASSOCIATES, P.C., states:

1. The Debtor ("Debtor" as used herein shall include both Debtors in a joint case) filed a voluntary Chapter 13 petition on February 2, 2016.
2. On the Petition Date the Debtor was indebted to Objector in the amount of \$10,810.92 (plus interest, fees and costs) and in possession of the following: 2015 Ford F150 (VIN: 1FTEW1EG5FFB32354) (Acct. No.: 4870) (the "Vehicle").
3. The Vehicle listed in Paragraph 2 was leased under a Vehicle Lease Agreement (the "Lease").
4. The Proposed Plan cannot be confirmed for the following reasons:
 - (a) The Proposed Plan fails to provide for treatment of the Vehicle or the debt related thereto.
 - (b) The Proposed Plan fails to specifically assume or reject the Lease pursuant to 11 U.S.C. §365.
 - (c) The Proposed Plan fails to provide for surrender of the Vehicle or Relief from the Automatic Stay at Lease maturity. The Lease matures on January 7, 2018, at which time, the Debtor's interest in the Vehicle ends and the Debtor has no right to retain possession, thereafter.

WHEREFORE, Ford Motor Credit Company LLC requests the Court to deny confirmation of the Proposed Plan, and to grant such other relief as may be appropriate and just.

Respectfully submitted,

KILPATRICK & ASSOCIATES, P.C.

By:  s/

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Dated: February 17, 2016